

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
AT MONROE**

<b>WENDY BARR DYE,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CASE NO. _____</b>
	)	
<b>IASIS GLENWOOD REGIONAL MEDICAL CENTER, LP</b>	)	<b>JUDGE _____</b>
	)	
<b>Defendant.</b>	)	<b>JURY DEMAND</b>
	)	

**NOTICE OF REMOVAL**

In accordance with 28 U.S.C. §§ 1331, 1441, and 1446, Defendant IASIS Glenwood Regional Medical Center LP (“Defendant”) hereby removes this case to the United States District Court for the Western District of Louisiana on the following grounds:

1. On May 14, 2018, Plaintiff Wendy Barr Dye (“Plaintiff”) filed a Petition against Defendant in the Parish of Ouachita, Fourth Judicial District, Louisiana Case No. C20181683, alleging violations of the Americans with Disabilities Act and Louisiana Civil Code 2315.

2. On July 17, 2018, Plaintiff affected service of process by personally serving a copy of the Citation and Petition in the Action on Defendant’s registered agent for service of process at 3867 Plaza Tower Drive, Baton Rouge, LA 70816. A copy of the Service of Process, Citation, and Petition are attached hereto as **Exhibit A**.

3. The Petition is a civil action arising under the laws of the United States because the Petition alleges causes of action arising under the laws of the United States. This Court has original jurisdiction of the Petition in accordance with 28 U.S.C. § 1331.

4. Removal of this action to this Court is proper under 28 U.S.C. § 1441 because this Court has original jurisdiction of this action under 28 U.S.C. §1331.

5. Venue is proper in this district under 28 U.S.C. § 1446 (a) as the United States District Court for the Western District of Louisiana, Monroe Division, is the federal district court for the district and division within which the above-referenced state-court action is pending.

6. In accordance with 28 U.S.C. § 1446(d), Defendant will promptly file a copy of the Notice of Removal with the Clerk for the Fourth Judicial District Court of Ouachita Parish, Louisiana and give written notice of this Notice of Removal to Plaintiff. Copies of all process, pleadings, and orders from the Ouachita Parish District Court's file have been attached hereto.

WHEREFORE, Defendant hereby removes this action from the Fourth Judicial District Court for Ouachita Parish, Louisiana to the United States District Court for the Western District of Louisiana.

Dated this 30<sup>th</sup> day of July 2018.

Respectfully submitted,

By: /s/ Jon K. Guice

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*\*pro hac vice forthcoming*

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was forwarded via the Court's Electronic Mailing System and has been served by United States mail, postage prepaid, to

J. Michael Rhymes (# 11212)  
1005 North Third Street  
Monroe, LA 71201

*Counsel for Plaintiff*

on this 30<sup>th</sup> day of July 2018.

/s/ Jon K. Guice

*Counsel for Defendant*